

cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 3

(Possession with Intent to Distribute Controlled Substances, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

3. On or about November 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant RAFIELL HAGLER did knowingly and intentionally possess with intent to distribute approximately 8.29 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 4

(Felon in Possession of Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

4. On or about November 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant RAFIELL HAGLER, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Aggravated Robbery, a felony of the first degree, on or about August 23, 1993, in Case Number CR-92-285673-A, in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Mossberg Model 835, 12 gauge shotgun, bearing serial number UM766293, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 5

(Felon in Possession of Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

5. On or about November 23, 2021, in the Northern District of Ohio, Eastern Division, Defendant RAFIELL HAGLER, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Aggravated Robbery, a felony of the first degree, on or about August 23, 1993, in Case Number CR-92-285673-A, in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce ammunition, to wit: 16 rounds of Norma 9 millimeter ammunition, bearing headstamp “Norma 9mm Luger, said ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 6

(Possession with Intent to Distribute Cocaine Base (“Crack”), 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

6. On or about April 13, 2022, in the Northern District of Ohio, Eastern Division, Defendant RAFIELL HAGLER did knowingly and intentionally possess with intent to distribute approximately 2.22 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE

The Grand Jury further charges:

7. The allegations contained in Counts 1-6 of this Indictment are hereby re-alleged and incorporated by reference as if stated fully herein for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853 (drug offenses); and Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c) (firearms offenses). As a result of these offenses, Defendant RAFIELL HAGLER shall forfeit to

the United States: (i) any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of the drug offenses; (ii) any and all of his property used - or intended to be used - in any manner or part, to commit or to facilitate the commission of the drug offenses; and, (iii) any and all firearms and ammunition involved in or used in the commission of the firearms offense; including, but not limited to, the following:

a.) \$501.00 in U.S. Currency, seized on November 23, 2021, from RAFIELL HAGLER;

b.) a Mossberg Model 835, 12 gauge shotgun, bearing serial number UM766293 and ammunition, seized at 2122 East 30th Street, Lorain, Ohio, on November 23, 2021;

c.) a Hi Point 9mm pistol with extended magazine, bearing serial number P137769 and 16 rounds of Norma 9mm Luger ammunition, seized at 2122 East 30th Street, Lorain, Ohio, on November 23, 2021;

d.) boxes of 9mm and .25 caliber ammunition, seized at 2122 East 30th Street, Lorain, Ohio, on November 23, 2021; and

e.) \$6,626.50 in U.S. Currency and a money counter, seized at 2122 East 30th Street, Lorain, Ohio, on November 23, 2021.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.